

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

NOBLE MARTIN,

*Plaintiff,*

-vs-

CHICAGO POLICE OFFICERS  
BRODERICK JONES and  
COREY FLAGG and  
CITY OF CHICAGO,

*Defendants.*

No. 02 CV 2199

(Judge St. Eve)

NOV 27 2002

**AMENDED COMPLAINT**

**DOCKETED**  
DEC 11 2002

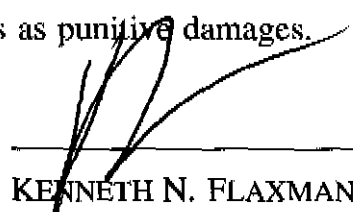
Pursuant to leave of court, plaintiff files this amended complaint and, by counsel, alleges as follows:

1. This is a civil action arising under 42 U.S.C. §1983. The jurisdiction of this court is conferred by 28 U.S.C. §1343.
2. Plaintiff Noble Martin is a resident of the Northern District of Illinois.
3. Defendant CITY OF CHICAGO is an Illinois municipal corporation.
4. Defendants COREY FLAGG and BRODERICK JONES were at all times relevant acting under color their authority as Chicago police officers.
5. REVISE HERE
6. On August 16, 2001, defendants FLAGG and JONES arrested plaintiff and caused plaintiff to be charged with a criminal offense. Defendants FLAGG and JONES fabricated the evidence on which they made this arrest and did not have a lawful basis on which to make this arrest.

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7. Defendants FLAGG and JONES used excessive and unreasonable force in placing plaintiff under arrest.
8. Thereafter, defendants FLAGG and JONES concealed defendant's innocence of any criminal wrongdoing from the prosecutors and thereby caused plaintiff to be held in custody for 7 months awaiting trial.
9. Plaintiff was acquitted of all charges on March 6, 2002.
10. Defendants FLAGG and JONES fabricated the evidence on which plaintiff's prosecution was based as the result of the deliberate indifference of defendant City of Chicago to the fabrication of evidence by its police officers.
11. As the direct and proximate result of the above described acts, plaintiff was deprived of rights secured by the Fourth and Fourteenth Amendment to the Constitution of the United States.
12. Plaintiff hereby demands trial by jury.

Wherefore plaintiff requests that judgment be entered in his favor and against defendants in an amount in excess of one hundred thousand dollars as compensatory damages and against defendants FLAGG and JONES in the amount of one hundred thousand dollars as punitive damages.

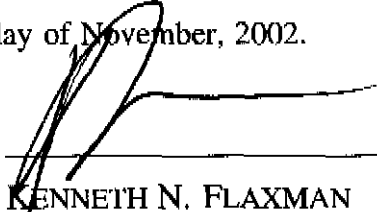


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*attorney for plaintiff*

## CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing to be served on Bridget Moore, Ass't Corp Counsel, 30 N LaSalle Street, Ste 1400, Chicago, Illinois 60602, by first class mail, postage prepaid, this 27th day of November, 2002.



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